Case 1:17-cv-00126-RC Document 5-1 Filed 04/06/17 Page 1 of 2 PageID #: 44

Wednesday, April 5, 2017 at 3:44:36 PM Central Daylight Time

Subject:

Horace Savoy v. Minstar Transport, Inc., et al

Date:

Friday, September 23, 2016 at 11:56:34 PM Central Daylight Time

From:

Gilbert Adams

To:

Daniel French

CC:

Gilbert Adams, Misty Wenger

Attachments: image001.png, image002.png

Mr. French:

I trust you received our letter of representation of the Savoys in this matter. We would appreciate the opportunity to take the statement of the Minstar driver. Additionally, we would appreciate receiving any witness statements, photographs and video that may be relevant.

To the extent Minstar had in place rules, policies procedures for the loading and/or unloading of the trailer/van, we would like to have a copy of these documents.

We request the driver logs and his personnel file be preserved and maintained as required by the Federal Motor Carrier Safety Standards. We are requesting a copy of these two items.

We would like the opportunity to inspect the interior of the trailer/van, certainly before any change of any kind is made. We regard it as evidence in the case and request that it or any other document, evidence or thing not be spoliated and be preserved as evidence in any necessary or potential litigation.

As mentioned, I will be glad to share medical with you as received. As you may have learned, Mr. Savoy has worked for Beaumont Tractor for 7 years and is highly thought of in his job. He is paid \$14.00 per hour by Beaumont Tractor and worked a 40 hour work week.

Mr. Savoy is married to Tiffany Savoy. Mrs. Savoy is an employee of Beaumont Bone and Joint. As you know, Mr. Savoy's ankle and both wrists are broke - he is in need of 24/7 care. He can't use crutches because of the injuries to his wrists. He can't even feed himself or hold a glass/cup of water. He is unable to engage in basic hygiene, such as cleaning himself after a bowel movement, applying deodorant, brushing his teeth or cleaning his body. I would appreciate Minstar's consideration of an advance on any eventual settlement of \$2,000.00 representing the wages that she will lose as she cares for him. Alternatively and even better, if Minstar would engage a home health nurse for 6-8 hours a day which might allow her to resume at least some of her lost hours at Beaumont Bone & Joint.

I will be in deposition Monday morning at least until early afternoon and should be available after 2:00 if you wish to discuss these matters or have questions or comments.

Thank you for your consideration of these matters.

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